

District Court Case No. 2:18-cv-10188-AG

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT,
SANTA ANA DIVISION

IN RE: STEVEN MARK ROSENBERG,
Debtor.

STEVEN MARK ROSENBERG
Appellant,

vs.

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS
TRUSTEE FOR ALLIANCE BANCORP, MORTGAGE BACKED
CERTIFICATE SERIES 2007-OA1, MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC., OCWEN LOAN SERVICING,
LLC,
Appellees.

Appeal from the U.S. Bankruptcy Court, Central District of
California, Case No. Case No. 1:17-bk-11748-VK, A.P. Case No.
1:17-ap-01096-vk, Hon. Victoria S. Kaufman,
Hon. Andrew J. Guilford, District Court Judge

**APPELLEE DEUTSCHE BANK'S REQUEST FOR
EXTENSION OF TIME TO FILE APPELLEE'S BRIEF**

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**Deutsche Bank National Trust Company, As Trustee for Alliance
Bancorp Mortgage Backed Certificate Series 2007-OA1**

Appellee Deutsche Bank National Trust Company, As Trustee for Alliance Bancorp Mortgage Backed Certificate Series 2007-OA1 (“Deutsche Bank”) hereby requests that this Court extend the time for it to file its appellee’s brief, currently due on July 5, 2019, by 30 days, to August 5, 2019. This is Deutsche Bank’s first request for an extension. The Court has already granted appellees Ocwen Loan Servicing, LLC and Mortgage Electronic Registration Systems, Inc. an extension of time to August 5, 2019 to file their appellee’s brief. (Doc. # 36.)

Appellant Steven Mark Rosenberg (“Appellant”) filed his Opening Brief and Appendix on June 5, 2019. Deutsche Bank’s deadline to respond is July 5, 2019.

Deutsche Bank requests that its appellee’s brief be due on August 5, 2019. This would be an extension of thirty (30) days from the date the brief is currently due. Due to multiple deadlines in other matters Deutsche Bank’s counsel requires more than the initial 30 days to prepare its appellee’s brief.

Deutsche Bank’s request for an extension is based upon the accompanying Declaration of Zi C. Lin under 9th Circuit BAP Rule 8018(a).

Dated: July 1, 2019

Garrett & Tully, PC

/s/ Zi C. Lin

Zi C. Lin

Motunrayo D. Akinmurele

Attorney for Appellee Deutsche
Bank National Trust Company, As
Trustee for Alliance Bancorp
Mortgage Backed Certificate Series
2007-OA1

DECLARATION

DECLARATION OF ZI C. LIN

I, Zi C. Lin, declare:

1. I am an attorney at law, duly licensed to practice before all courts of the State of California and before all bankruptcy and district courts of that state. I am also admitted before the Ninth Circuit. I am a partner with Garrett & Tully, PC, counsel of record for Deutsche Bank National Trust Company, As Trustee for Alliance Bancorp Mortgage Backed Certificate Series 2007-OA1 (“Deutsche Bank”). I have personal knowledge of the facts set forth below, and if called upon to testify thereto, I could and would competently do so.

2. I am requesting a thirty day extension, to August 5, 2019, to file Deutsche Bank’s appellee’s brief. This is Deutsche Bank’s first request for an extension. The Court has already granted appellees Ocwen Loan Servicing, LLC and Mortgage Electronic Registration Systems, Inc. an extension of time to August 5, 2019 to file their appellee’s brief. (Doc. # 36.)

3. Although Deutsche Bank has made progress in the preparation of its brief, an extension of time is necessary to allow it to complete the brief due to multiple deadlines in my other matters. These other matters include preparing for and arguing a motion for summary judgment on June 13, 2019 in *Shah v. Fidelity National Title Insurance Company*, Santa Clara Superior Court case no. 2011-1-CV-203571, and preparing for and attending oral argument in the California Court of Appeal, Second District, Division 8, on June 27, 2019 in *Ranch at the Falls LLC et al. v. Keith O’Neal et al.*, case no. B283986. *Ranch at the Falls* involves complex real property issues, and an extensive record on

appeal, including a 15 volume appendix.

I declare under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct and that this Declaration was executed on July 1, 2019 at Pasadena, California.

/s/ Zi C. Lin

Zi C. Lin

CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2019 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

VIA U.S. MAIL

Steven Mark Rosenberg
106-1/2 Judge John Aiso St., #225
Los Angeles, CA 90012

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 1, 2019.

/s/Delorise Cameron

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